

November 22, 2011

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
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DOCKET

09-RENEW EO-1

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To Whom It May Concern:

In response to the Desert Renewable Energy Conservation Group (DRECP) request for stakeholder comments regarding Docket Number 09-RENEW EO-01, Clean Line Energy Partners LLC (Clean Line) and Centennial West Clean Line LLC (Centennial West) respectfully submit these comments.

Clean Line focuses exclusively on developing long-haul, high-voltage direct current (HVDC) transmission lines to connect renewable resources to load. California, in line with the state's 33% by 2020 Renewable Portfolio Standard (RPS) goal, should pursue a broad range of opportunities to increase the share of renewable resources in its overall generation portfolio in an efficient and cost effective manner. With this goal in mind, California should take full advantage of low-cost imported renewable energy from other Western states and the transmission infrastructure designed to facilitate these imports.

The Centennial West Clean Line project will transport wind and solar energy from New Mexico and Arizona to Southern California. New Mexico and Arizona resources also benefit the California grid by increasing geographic diversity. In combination with California renewable resources, the increased geographic diversity will reduce the size and frequency of rapid upward or downward shifts in energy production, resulting in an overall lower cost to integrate large volumes of renewables.

The attached comments ask for two clarifications in the report. One, to include more clarity on the connection between California and other western interconnect states transmission planning; and two, for a more defined role of the various California permitting agencies regarding transmission.

Clean Line looks forward to continued participation in the DRECP process with the end goal of a comprehensive, reliable, cost-effective transmission plan that best serves California's policy initiatives.

Respectfully submitted,



Jayshree Desai, Executive Vice President
Clean Line Energy Partners LLC

DRECP Framework Conservation Strategy Report

Comment Form

Commenter (Your Name)	Comment #	Comment Location:					Reviewer Comment (e.g., organization, content, grammatical comments)
		Chapter	Section #	Page #	Paragraph	Paragraph (from top)	
Clean Line Energy Partners	1	4	4.1.3	4-13	1	1	<p>While the Conservation Strategy follows Section 2.5.3 of the DRECP Planning Agreement, this approach seems to limit the consideration of transmission planning to CPUC, CAISO, and local governments with regulatory approval. We suggest that Section 4.1.3 of the Conservation Strategy also name other regional transmission planning documents affecting California and the Western Interconnect in this section. Specifically, the current planning documents developed by Southwest Area Transmission (SWAT) and the Western Electricity Coordinating Council (WECC) should be considered. Here is the link to the WECC 10-year plan: http://www.wecc.biz/library/StudyReport/Wiki%20Pages/Home.aspx and information on SWAT: http://www.westconnect.com/filestorage/western_initiatives_booklet_final_070611.pdf</p>
Clean Line Energy Partners	2	4	4.1.3	4-14	1	1	<p>Section 4.1.3 states, <i>“Permitting and siting responsibility, and consequently proximity of the projects to transmission lines/corridors, falls to the California Public Utilities Commission (CPUC).”</i></p> <p>We suggest revising this sentence to reflect the broad array of potential permitting agencies with regulatory authority over transmission projects, including the CEC. (See Section 2.5.1 of the DRECP agreement, <i>“The Parties intend that the DRECP and the CEC’s execution of an implementing Agreement will require the CEC to certify jurisdictional power facilities located in the Planning area in accordance with the terms of the DRECP and Implementing Agreement”</i>.)</p> <p>Also of importance, generation tie transmission lines from other renewable sources which are otherwise unregulated may be subject to CEQA analysis by various municipal entities. The document should be expanded to include planning agencies that may be involved in renewable transmission development.</p>

Commenting on: (Clean version, track changes version) _____